#### **REMARKS**

The Office Action has been reviewed and the Examiner's comments carefully considered. Claims 1, 20, 21 and 22 are amended. No claims are cancelled or added. Thus, claims 1-22 remain pending and are submitted for reconsideration.

# Rejection of claims 1-2, 6-8, 11-12, and 20-22 based on Takahashi

Claims 1-2, 6-8, 11-12, and 20-22 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent 6,612,607 ("Takahashi"). The rejection should be withdrawn because Takahashi fails to disclose, teach or suggest the claimed invention.

For example, claim 1 (as amended) recites "wherein the frame member includes a first opening for the airbag such that the frame member does not deform when the airbag is being deployed and a second opening configured to be connected to a retainer for retaining the airbag" and "the entire periphery of the first opening of the frame member directly abuts the back surface of the plate member." Claims 20-22 include similar or analogous features. Takahashi does not disclose or suggest this combination of features. In particular, the airbag door portion 20, 172 of Takahashi has a contoured back surface with an aperture that receives a hook-like protrusion of the air bag case 14 (see the right-hand sides of the air bag case 14 in Figs. 1 and 32A) so this portion of the air bag case is not directly abutting the back surface of the air bag door portion 20, 172. Also, the air bag case 14 does not have a second opening that receives a retainer for retaining the airbag because the case 14 is continuous along its bottom surface. Accordingly, Takahashi does not teach or suggest all the features of claims 1 and 20-22. Thus, claims 1 and 20-22 are not anticipated by Takahashi, and the rejection should be withdrawn.

Claims 2, 6-8, and 11-12 depend from and contain all the features of claim 1, and are allowable therewith for at least the reasons set forth above, without regard to the further patentable limitations contained therein.

Favorable reconsideration of the rejection based on Takahashi is respectfully requested.

# Rejection of claims 2-5, 9-10, and 13-15 based on Takahashi and Desprez

Claims 2-5, 9-10, and 13-15 are rejected under 35 U.S.C. 103(a) as being unpatentable over Takahashi and U.S. Patent 6,595,543 ("Desprez"). The rejection should be withdrawn because Takahashi, Desprez, or any combination thereof fails to disclose, teach or suggest the

claimed invention. Claims 2-5, 9-10, and 13-15 depend from and contain all the features of claim 1. As previously mentioned, Takahashi does not teach or suggest a frame member that includes a first opening and a second opening configured to be connected to a retainer for retaining the airbag and that the entire periphery of the first opening of the frame member directly abuts the back surface of the plate member. Desprez does not cure these deficiencies. Thus, claims 2-5, 9-10, and 13-15 are not rendered unpatentable over the prior art and the rejection should be withdrawn. Favorable reconsideration of the rejection based on Takahashi and Desprez is respectfully requested.

#### Rejection of claims 13-17 based on Takahashi and Suzuki

Claims 13-17 are rejected under 35 U.S.C. 103(a) as being unpatentable over Takahashi and U.S. Patent 6,601,870 ("Suzuki"). The rejection should be withdrawn because Takahashi, Suzuki, or any combination thereof fails to disclose, teach or suggest the claimed invention. Claims 13-17 depend from and contain all the features of claim 1. As previously mentioned, Takahashi does not teach or suggest a frame member that includes a first opening and a second opening configured to be connected to a retainer for retaining the airbag and that the entire periphery of the first opening of the frame member directly abuts the back surface of the plate member. Suzuki does not cure these deficiencies. Thus, claims 13-17 are not rendered unpatentable over the prior art and the rejection should be withdrawn. Favorable reconsideration of the rejection based on Takahashi and Suzuki is respectfully requested.

## Rejection of claims 18-19 based on Takahashi and Hagen

Claims 18-19 are rejected under 35 U.S.C. 103(a) as being unpatentable over Takahashi and U.S. Patent 5,651,562 ("Hagen"). The rejection should be withdrawn because Takahashi, Hagen, or any combination thereof fails to disclose, teach or suggest the claimed invention. Claims 18-19 depend from and contain all the features of claim 1. As previously mentioned, Takahashi does not teach or suggest a frame member that includes a first opening and a second opening configured to be connected to a retainer for retaining the airbag and that the entire periphery of the first opening of the frame member directly abuts the back surface of the plate member. Hagen does not cure these deficiencies. Thus, claims 18-19 are not rendered unpatentable over the prior art and the rejection should be withdrawn. Favorable reconsideration of the rejection based on Takahashi and Hagen is respectfully requested.

### Conclusion

It is believed that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check or credit card payment form being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

Date

FOLEY & LARDNER LLP

Customer Number: 22428

Telephone:

(202) 672-5490

Facsimile:

(202) 672-5399

Howard N. Shipley

Registration No. Registration 39,370

Matthew J. Kremer

Registration No. 58,671